

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	NO. 4:23 CR 00293 HEA
BRANDON BOSLEY,	)	
	)	
Defendant.	)	

**GOVERNMENT'S MOTION TO CONTINUE TRIAL**

Comes now the United States of America, by and through Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Hal Goldsmith, Assistant United States Attorney for said District and, for its Motion to Continue Trial, states to this Honorable Court as follows:

1. Trial in this case is currently scheduled to begin on May 12, 2025. This is the first trial setting, and the United States has not previously requested a trial continuance. The government has previously estimated that trial in this case will last 3 to 4 days, and that is still the government's best estimate.

2. The United States has learned that an essential witness, Mr. Paul Johnson, will be unavailable the week of May 12, 2025 due to prepaid travel plans, a cruise in Alaska. Mr. Johnson, of Missouri Farm Bureau Insurance, is the individual witness who personally communicated with Defendant Bosley relative to the fraud charges contained in the pending Indictment. Thus, Mr. Johnson's testimony is essential to the United States' case in chief.

3. The undersigned has conferred with defense counsel, Ms. Diane Dragan, who has advised that she will not be opposing this motion.

4. The undersigned Assistant U.S. Attorney has blackout dates as follows due to other trials or travel out of the District: The week of May 27, 2025; the week of June 2, 2025; and the week of June 23, 2025. Counsel for Defendant, Ms. Dragan, has blackout dates as follows due to other trials or travel out of the District: Mid June through Mid July; a trial in state court beginning on August 7, 2025. **Counsel for both parties consider a trial setting during the end of August or thereafter would be preferable, if the Court's schedule allows.**

5. The instant Motion to Continue Trial is not for the purpose of undue delay, or to interfere with the due administration of justice, but to ensure that all essential evidence may be presented to the Court. The United States requests that this Court find that the ends of justice served by a continuance outweigh the interest of the public and the defendant in a speedy trial, such that the delay occasioned by such continuance is excluded from the Speedy Trial Act's time limits.

WHEREFORE, the United States of America prays that this Honorable Court grant the government's Motion to Continue Trial, and for such other relief as this Court deems appropriate and just under the circumstances.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 17, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the counsel for defendant.

/s/ Hal Goldsmith  
HAL GOLDSMITH  
Assistant United States Attorney